

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA

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CRIMINAL NO: 12-117

v.

*

SECTION: "B"

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TIWANA ALEXANDER

* * *

FACTUAL BASIS

If this case were to proceed to trial, the United States would produce the following competent testimony and evidence to prove beyond a reasonable doubt the defendant, TIWANA ALEXANDER's, guilt to Count One of the Indictment:

A representative from the Department of Housing and Urban Development ("HUD"), an agency and department of the United States, would testify that the Supportive Housing Program was a congressionally authorized program funded through HUD and designed to assist homeless individuals obtain housing and life-skills training. HUD awarded federally funded grants annually to state and local government and other non-government organizations and agencies across the country to implement the Supportive Housing Program. Funds from the Supportive Housing Program grant paid for a deposit and one to three months rent for a qualifying homeless individual or family and case management or life-skills training for the homeless individual or

family to become self-sustaining during that time period.

The House of Ruth was a non-profit organization located in New Orleans that received federal funds from HUD annually to implement the Supportive Housing Program in the Eastern District of Louisiana. Once qualified for the program, an individual or family was eligible to receive the benefit of the federal funds for the deposit and one to three months of rent for an apartment. The House of Ruth would issue checks payable to the landlords who rented the apartments to the qualified individuals or families.

At trial, testimony and evidence would be presented to show that on five (5) occasions from on or about July 1, 2007 until January 1, 2008, the defendant, TIWANA ALEXANDER, sought and received monetary assistance from House of Ruth funds through a House of Ruth case manager named Samantha Cornelius who agreed to provide the defendant, TIWANA ALEXANDER, with funds from House of Ruth even though she did not qualify for assistance. At the time that the defendant, TIWANA ALEXANDER, requested money from the House of Ruth, she was not homeless and was gainfully employed as a New Orleans police officer. On or about August 31, 2007, the defendant, TIWANA ALEXANDER, purchased a home of her own.

At trial, testimony and documents would be offered to show that on or about November 1, 2007, Samantha Cornelius gave the defendant, TIWANA ALEXANDER, a House of Ruth check for \$900.00 made payable to Person A, an individual other than the defendant, TIWANA ALEXANDER, and whom the defendant, TIWANA ALEXANDER, knew was not her landlord. Samantha Cornelius obtained the name and address of Person A from the defendant, TIWANA ALEXANDER. Testimony and documents would be offered to show that the defendant, TIWANA ALEXANDER, endorsed the \$900.00 House of Ruth check and agreed to have it

deposited into her bank account. The money that the defendant received was from the federal funds that House of Ruth received to assist homeless individuals and families.

Following her receipt and deposit of the November 1, 2007, check from the House of Ruth, the defendant, TIWANA ALEXANDER, received and deposited two additional House of Ruth checks totaling \$1800.00 from Samantha Cornelius again made payable to Person A, an individual who was not the defendant's landlord. At trial, documents and testimony would be offered to prove that the monies the defendant received from the checks issued on December 1, 2007, and January 1, 2008, were from federal funds at the House of Ruth designated for homeless individuals or families. The defendant, TIWANA ALEXANDER, admits that she knew that she did not qualify to receive the federal funds that House of Ruth provided for homeless individuals and families.

Read and Approved:

TIWANA ALEXANDER (Date)
Defendant

ERIC HESSLER (Date)
Defense Counsel for Tiwana Alexander

EMILY K. GREENFIELD (Date)
Assistant United States Attorney